UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

Honorable Edward S. Kiel

TERENCE SHAW

Mag. No. 20-15278

a/k/a "Sweet Meat"

I, John Gikas, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Task Force Officer with the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHMENT B

John Gikas, Task Force Officer Federal Bureau of Investigation

Task Force Officer John Gikas attested to this Affidavit by telephone pursuant to FRCP 4.1(b)(2)(A) on the 17th day of June, 2020.

Honorable Edward S. Kiel United States Magistrate Judge

Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Possession of a Firearm and Ammunition by a Convicted Felon)

On or about January 16, 2017, in the District of New Jersey and elsewhere, the defendant,

TERENCE SHAW,

a/k/a "Sweet Meat,"

knowing that he had previously been convicted in a court of at least one crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting commerce a firearm and ammunition, and did aid and abet same.

In violation of Title 18, United States Code, Sections 922(g)(1) and 2.

ATTACHMENT B

- I, John Gikas, am a Task Force Officer with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and photographs of the evidence. Where statements of others are related herein, they are related in substance and part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.
- 1. On or about January 16, 2017, Terence Shaw ("Shaw") participated in and aided and abetted the murder of three individuals, all of which were committed with a firearm.
- 2. At approximately 7:21 p.m., Shaw and a fellow member of the NHB criminal street gang, which operated in the area of Bidwell Avenue in Jersey City, New Jersey (hereinafter "Co-Conspirator 1") purchased a pair of Cobra CXT385 walkie-talkie radios from the Walmart in Bayonne, New Jersey. After departing the Walmart, Shaw and Co-Conspirator 1 entered Shaw's Acura TL.
- 3. From approximately 8:06 p.m. until approximately 8:20 p.m., Shaw and Co-Conspirator 1 stopped at Shaw's residence on Garfield Avenue in Jersey City, New Jersey.
- 4. At approximately 9:45 p.m., Shaw, Co-Conspirator 1, and a third member of the NHB criminal street gang hereinafter ("Co-Conspirator 2") walked from the area of Co-Conspirator 2's residence on Stegman Street in Jersey City, New Jersey, through an alleyway located on Dwight Street, ultimately arriving on Bayside Place.
- 5. Shaw, Co-Conspirator 1, and Co-Conspirator 2, then entered a stolen U-Haul truck, which had previously been parked on Bayside Place, traveled on Bayside Place, turned right on Fulton Street, and traveled approximately 0.2 miles, at which time the U-Haul stopped. The U-Haul remained parked in this location from approximately 9:52 p.m. until approximately 10:02 p.m., and at all times remained running.
- 6. At approximately 10:02 p.m.—the same time that the U-Haul departed the area—the Jersey City Police Department received a call by way of 9-1-1, which reported shots fired at 101 Fulton Street.
- 7. Upon arrival at approximately 10:04 p.m., law enforcement discovered three victims: a twenty-six-year-old male, known to law enforcement as a member of the Sex Money Murder street gang in Jersey City, New Jersey, with a gunshot wound to the back of the head, a gunshot wound to the left arm,

and a gunshot wound to the right shoulder (hereinafter "Victim 1"); a twenty-five-year-old female—visibly pregnant—with a gunshot wound to the back of her head and another gunshot wound to the chest (hereinafter "Victim 2"); and Co-Conspirator 2, who suffered a gunshot wound to the chest. All three victims were pronounced dead.

- 8. Co-Conspirator 2—the third murder victim—was dressed in all black clothing, with his head covered by a black hoodie and his hands covered by black gloves. Under his torso in close proximity to his right hand, law enforcement recovered a Cobra CXT385 walkie-talkie.
- 9. In total, six shell casings and six projectiles were recovered from the crime scene. Subsequent analysis of the ballistics evidence revealed that all six shell casings were 9mm Luger caliber. In addition, this analysis revealed that all six shell casings were fired from the same firearm.
- 10. As law enforcement processed the crime scene, law enforcement received information from a nearby resident who reported two males abandoning a U-Haul and running with handguns on Bayside Place shortly after the time of the murder.
- 11. At approximately 10:05 p.m., Shaw and Co-Conspirator 1 walked from Bayside Place where the stolen U-Haul was abandoned, through the alleyway on Dwight Street, and ultimately returned to Shaw's Acura in the area of Co-Conspirator 2's residence.
- 12. At approximately 10:29 p.m., automated license plate readers captured Shaw's Acura traveling away from Co-Conspirator 2's residence on Tonnelle Avenue. Cell site data for Shaw and Co-Conspirator 1 for this time period revealed that Shaw and Co-Conspirator 1 remained together until approximately midnight.
- 13. Subsequent investigation into the U-Haul revealed that two individuals (hereinafter "Co-Conspirator 3" and "Co-Conspirator 4") stole the U-Haul from Tonnelle Avenue in Jersey City, New Jersey on January 15, 2017, at approximately 8:20 p.m.
- 14. Subsequent analysis of cell phone records of Shaw and Co-Conspirator 3 revealed that between approximately 3:55 p.m. and 6:59 p.m. on January 15, 2017, Shaw and Co-Conspirator 3 exchanged four calls. Shortly after the U-Haul was stolen, Shaw called Co-Conspirator 3 at approximately 9:09 p.m. and approximately 10:00 p.m. The following day—the day of the murders—Shaw received two phone calls from Co-Conspirator 3.
- 15. Based on Shaw's communications with Co-Conspirator 3 shortly before and shortly after the theft of the U-Haul that was used to facilitate the murders; Shaw's purchase of a Cobra CXT385 walkie-talkie shortly before the

murder and the recovery of a Cobra CXT385 walkie-talkie on the person of Co-Conspirator 2 at the crime scene; the location data recovered from Shaw's cell phone before and after the murder, which places him in the vicinity of the murder and retreating from the murder shortly thereafter; the vehicle data recovered from Shaw's Acura before and after the murder, which places Shaw in his vehicle and the vehicle in the vicinity of the murder and retreating from the murder shortly thereafter; and witness statements, including the report of two men running from the abandoned U-Haul with handguns almost immediately after the murder, the evidence demonstrates that Shaw participated in and aided and abetted the murder of Victim 1, Victim 2, and Co-Conspirator 2.

- 16. On or about June 19, 2009, Shaw was convicted in the Superior Court of New Jersey, Hudson County, of unlawful possession of a handgun, in violation of N.J.S.A. 2C:39-5B, a crime punishable by imprisonment for a term exceeding one year, and for which Shaw received a sentence of five years' imprisonment.
- 17. On or about January 25, 2008, Co-Conspirator 1 was convicted in the Superior Court of New Jersey, Hudson County, of distribution of controlled dangerous substances on or near school property, in violation of N.J.S.A. 2C:35-7, a crime punishable by imprisonment for a term exceeding one year, and for which Co-Conspirator 1 received a sentence of three years' imprisonment.